

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

SARAH WILSON,
Plaintiff,

v.

BIG LOTS STORES, INC.,
Defendants.

§
§
§
§
§
§
§

**CIVIL CASE NO. 1:20-cv-443
JURY TRIAL DEMANDED**

**DEFENDANT BIG LOTS STORES, INC.'S
INDEX OF MATTERS BEING FILED**

Defendant, BIG LOTS STORES, INC.'S ("Defendant"), files this Index of all documents filed in the state court action:


- (1) Plaintiff's Original Petition filed September 24, 2020;
- (2) Request for Process filed on September 24, 2020;
- (3) Citation to Big Lots Stores, Inc.;
- (4) Affidavit of Service filed October 15, 2020;
- (5) Defendants Original Answer filed on October 26, 2020;
- (6) Civil Docket, District Court Sheet; and
- (7) Case Ledger.

Respectfully submitted,

MAYER LLP

750 North Saint Paul Street, Suite 700
Dallas, TX 75201

214.379.6900 / F: 214.379.6939

By: 
Zach T. Mayer, Attorney-in-Charge
State Bar No. 24013118
zmayer@mayerllp.com
Sara Krumholz
State Bar No. 24060579
E-Mail: skrumholz@mayerllp.com

**ATTORNEYS FOR DEFENDANT
BIG LOTS STORES, INC.**

CERTIFICATE OF SERVICE

The undersigned does hereby certify that on October 30, 2020, the foregoing document was electronically filed, as required by the United States District Court for the Eastern District of Texas, using the Court's CM/ECF filing system, which will provide notice and a copy of this document, with attachments, to the following, who are indicated to be registered ECF filers in the United States District Court for the Eastern District of Texas:

Jonathan C. Juran
SBN: 11047225
jonathanjuhan@sbcglobal.net
Regina C. Bost
SBN: 24095693
regina.juhanlaw@gmail.com
Attorneys for Plaintiff
985 I-10 North, Ste. 100
Beaumont, TX 77706
409/832-8877 - Telephone
409/924-8880 - Facsimile
Attorneys for Plaintiffs

☐ E-MAIL
☐ HAND DELIVERY
☐ FACSIMILE
☐ OVERNIGHT MAIL
☐ REGULAR, FIRST CLASS MAIL
☒ CM/ECF
☐ CERTIFIED MAIL/RETURN RECEIPT REQUESTED

/s/ Sara Krumholz
Sara Krumholz

FILED
DISTRICT CLERK OF
JEFFERSON CO TEXAS
9/24/2020 4:35 PM
JAMIE SMITH
DISTRICT CLERK
A-206368

No. _____

SARAH WILSON
Plaintiff,

§
§
§
§
§
§
§

IN THE DISTRICT COURT OF

VS.

JEFFERSON COUNTY, TEXAS

BIG LOTS STORES, INC.
Defendant.

_____ JUDICIAL DISTRICT

**PLAINTIFF'S ORIGINAL PETITION, REQUEST FOR DISCLOSURE,
AND RULE 193.7 NOTICE**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW SARAH WILSON, hereinafter styled Plaintiff, complaining of
BIG LOTS STORES, INC., hereinafter styled Defendant, and for cause of action against said
Defendant would respectfully show the Court as follows:

I.

Plaintiff designates that discovery in this cause of action shall be governed by Rule 190.3
discovery control plan (level 2) of the Texas Rules of Civil Procedure.

II.

Pursuant to Rule 47, Plaintiff SARAH WILSON, seeks monetary relief in an amount over
\$100,000 but not more than \$250,000.

III.

Plaintiff resides in Port Arthur, Jefferson County, Texas. Pursuant to CPRC
§30.014(2), the last three numbers of Plaintiff's social security number are 576.

IV.

Defendant, BIG LOTS STORES, INC., is a corporation, company, partnership,



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

October 27, 2020

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith Page 1 of 5

proprietorship or some such business entity. That said Defendant does business in the state of Texas and from time to time within the jurisdiction of this Honorable Court; that said Defendant may be served with process by serving its agent for service, Corporation Service Company d/b/a CSC – Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701-3218.

SERVICE IS REQUESTED AT THIS TIME.

Plaintiff invokes Rule 28 of the Texas Rules of Civil Procedure, as appropriate.

V.

On or about December 20, 2018, in Groves, Jefferson County, Texas, Plaintiff, SARAH WILSON was an invitee at Defendant, BIG LOTS STORES, INC., located at 5000 Twin City Highway, and was badly injured when a large rug fell off the shelf, striking Plaintiff in the back of the head. There were no warning signs in or around the area to warn of the improperly and dangerously placed rugs. The incident resulted in the serious injuries and damages complained of herein.

VI.

On the occasion in question the Defendant was guilty of various acts, wrongs and omissions. Each and all constituted negligence and such negligence was a proximate cause of the injuries and damages of which Plaintiff complains.

In the alternative, Plaintiff would show that the Defendant owed a duty to the general public, including Plaintiff SARAH WILSON, to use ordinary care, including the duty to protect and safeguard Plaintiff from unreasonably dangerous conditions on the premises or to warn of their existence.



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

October 27, 2020

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith Page 2 of 5

Plaintiff was an invitee at the time of the injury, therefore the Defendant owed her a duty to exercise ordinary care to keep the premises in a reasonably safe condition, inspect the premises to discover latent defects, and to make safe any defects or give an adequate warning of any dangers. Defendant's conduct and that of their agents, servants and employees, acting within the scope of their employment, constituted a breach of the duty of ordinary care owed by Defendant to Plaintiff. Defendant knew or should have known the conditions in its retail area created an unreasonable risk of harm to invitees, in that the Defendant knew or should have known of the danger of customers being injured due to the dangerous condition described above. Defendant knew this condition caused an unreasonable risk of harm to persons such as the Plaintiff who would be frequenting their retail establishment. Defendant failed to exercise ordinary care to reduce or eliminate this risk, or warn invitees, such as Plaintiff, regarding the dangerous condition. Each of these acts and omissions, whether taken singularly or in any combination, was a proximate cause of Plaintiff's injuries and damages as described below.

VII.

As a direct and proximate result of the negligence and carelessness of the Defendant, Plaintiff, SARAH WILSON has suffered with debilitating and severe injuries to her head, neck, and back. Plaintiff's injuries included headaches, multiple disc protrusions, contusions and soreness to the body in general. That because of such injuries she has suffered the following:

1. Reasonable and necessary medical expenses - past
2. Reasonable and necessary medical expenses - future
3. Loss of earnings and earning capacity - past
4. Loss of earnings and earning capacity - future



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

October 27, 2020

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith Page 3 of 5

5. Physical impairment - past
6. Physical impairment - future
7. Physical pain - past
8. Physical pain - future
9. Mental anguish - past
10. Mental anguish – future
11. Disfigurement – past
12. Disfigurement – future

In this connection, Plaintiff would show the Court that the damages sought are within the jurisdictional limits of this Honorable Court, for which she sues the Defendant herein.

VIII.

Under Texas Rule of Civil Procedure 194, Plaintiff requests that each Defendant disclose, within 50 days of service of this request, the information or material described in Rule 194.2 (a) through (I).

IX.

Pursuant to Rule 193.7 of the Texas Rules of Civil Procedure, Plaintiff hereby gives actual notice to Defendant that any and all documents produced by Defendant may be used against Defendant at any pretrial proceeding and/or at the trial of this matter without the necessity of authenticating the documents.

X.

Plaintiff, SARAH WILSON says that if in the event she had pre-existing conditions in her body prior to this incident that such conditions were painless and symptom-free, but because of



October 27, 2020

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith Page 4 of 5

the injuries she suffered in this incident, such conditions were lighted up, aggravated and precipitated.

WHEREFORE, premises considered, Plaintiff prays that the Defendant be cited to appear and answer herein; that upon a trial of this cause that Plaintiff has and recovers of and from the Defendant judgment for the damages as may be deemed just and fair by the Court; that she has such judgment, together with all legal interest, including pre-judgment interest, costs of suit and for other relief to which Plaintiff may be justly entitled.

Respectfully submitted,

BY: /s/JONATHAN C. JUHAN
JONATHAN C. JUHAN
SBN: 11047225
jonathanjuhan@sbcglobal.net
Regina C. Bost
SBN: 24095693
regina.juhanlaw@gmail.com
Attorneys for Plaintiff
985 I-10 North, Ste. 100
Beaumont, TX 77706
409/832-8877 - Telephone
409/924-8880 - Facsimile



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

October 27, 2020

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith Page 5 of 5



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

October 27, 2020

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith

Certified Document Number: 2249929 Total Pages: 5

In accordance with Texas Government Code 51.301 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail districtclerk@co.jefferson.tx.us

EXHIBIT C-1



JAMIE SMITH
JEFFERSON COUNTY DISTRICT CLERK
1085 PEARL STREET, ROOM 203, BEAUMONT, TX 77706

FILED
DISTRICT CLERK OF
JEFFERSON CO TEXAS
9/24/2020 4:35 PM
JAMIE SMITH
DISTRICT CLERK
106368

REQUEST FOR PROCESS

All sections must be completed for processing this request.

Section 1:

Cause No. _____

Date September 24, 2020

Style:

Sarah Wilson

VS

Big Lots Stores, Inc.

Section 2:

Check Process Type:

☒ Citation ☐ Precept to Serve / Notice of Hearing/Notice to Show Cause

☐ Temporary Restraining Order

☐ Application for Protective Order / Temporary (Ex Parte) Protective Order

☐ Notice of Registration of Foreign Judgment ☐ Citation by Posting

☐ Writ of _____ ☐ Other _____

☐ Citation by Publication*- Newspaper: _____

☐ Check box if you would like the District Clerk's Office to make copies for your service. (\$1.00 per page per pleading for copies for service)

Section 3:

Title of Document/Pleading to be attached for service: _____

Plaintiff's Original Petition with Request for Disclosure and Rule 193.7 Notice

Note: You must furnish one copy of the document/pleading for each party served.

Section 4: PARTIES TO BE SERVED (Please type or print):

1. Name: Big Lots Stores, Inc. (reg. agent: Corporation Service Company d/b/a CSC - Lawyers Incorporating Service Company)

Address: 211 E. 7th Street, Suite 620

City: Austin State: Texas Zip: 78701-3218

2. Name: _____

Address: _____

City: _____ State: _____ Zip: _____

I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

October 27, 2020

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith Page 1 of 2



3. Name: _____

Address: _____

City: _____ State: _____ Zip: _____

4. Name: _____

Address: _____

City: _____ State: _____ Zip: _____

5. Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Section 5

Check Service Type:

- | | |
|---|--|
| <input type="checkbox"/> No Service | <input type="checkbox"/> Secretary of State |
| <input type="checkbox"/> Sheriff | <input type="checkbox"/> Commissioner of Insurance |
| <input type="checkbox"/> Constable Pct. | <input type="checkbox"/> Out of County |
| <input type="checkbox"/> Out of State | <input checked="" type="checkbox"/> Private Process <input type="checkbox"/> Other |
| <input type="checkbox"/> Certified Mail | |

Section 6 (ONLY if Section 7 does not apply)

Attorney Name: JONATHAN C. JUHAN**Address:** 985 I-10 North, Suite 100

Beaumont	Street/P.O. Box	Texas	77706
City		State	Zip

Attorney's Telephone No. 409/832-8877 Attorney's Bar No. 11047225

Section 7 (ONLY if Section 6 does not apply)

Pro-Se Name: _____

Address: _____

_____	_____	_____
City	State	Zip

Telephone No. _____

Section 8

Check Delivery Type:

- ☐
- Hold for pick up
- ☒
- Mail to Attorney

I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

October 27, 2020

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS*Jamie Smith* Page 2 of 2



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

October 27, 2020

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith

Certified Document Number: 2249930 Total Pages: 2

In accordance with Texas Government Code 51.301 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail districtclerk@co.jefferson.tx.us

EXHIBIT C-2

C0206368---00003

C0206368---00003

CITATION

THE STATE OF TEXAS

No. A-0206368

**SARAH WILSON
VS. BIG LOTS STORES INC**

CITATION

**58 th JUDICIAL DISTRICT COURT
of JEFFERSON COUNTY, TEXAS**

To: **BIG LOTS STORES INC
BY SERVING ITS REGISTERED AGENT CORPORATION SERVICE COMPANY
DBA CSC-LAWYERS INCORPORATING SERVICE COMPANY**

by serving at:
**211 E 7TH STREET
SUITE 620
AUSTIN, TX 78701**

DEFENDANT:

NOTICE:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. Said answer may be filed by E-filing through efiletexas.gov, if represented by an attorney; or if filed pro se by delivering or mailing same to District Clerk's Office, 1085 Pearl, Room 203, Beaumont, TX 77701. The case is presently pending before the 58 th District Court of Jefferson County sitting in Beaumont, Texas, and was filed on the 24th day of September, 2020. It bears cause number A-0206368 and is styled:

**SARAH WILSON
VS.
BIG LOTS STORES INC**

Plaintiff:

Defendant:

The name and address of the attorney for plaintiff (or plaintiff if pro se) is:

**JUHAN, JONATHAN, Atty.
985 I-10 NORTH SUITE 100
BEAUMONT, TX 77706-0**

The nature of the demands of said plaintiff is shown by a true and correct copy of Plaintiff's PETITION (PLAINTIFF'S ORIGINAL) accompanying this citation and made a part thereof.

Issued under my hand and the seal of said court, at Beaumont, Texas, this the 25th day of September, 2020.

**JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS**



BY

Erin Hauger

Deputy

Erin

I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

October 27, 2020

**JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS**

Jamie Smith Page 1 of 2



RETURN OF SERVICE

A-0206368 58 th JUDICIAL DISTRICT COURT
 SARAH WILSON
 BIG LOTS STORES INC

Executed when copy was delivered:

This is a true copy of the original citation, was delivered to defendant _____, on the _____ day of _____, 20____.

_____, Officer
 _____, County, Texas
 By: _____, Deputy

ADDRESS FOR SERVICE:

BIG LOTS STORES INC
 BY SERVING ITS REGISTERED AGENT CORPORATION SERVICE COMPANY
 211 E 7TH STREET
 SUITE 620
 AUSTIN, TX 78701 0000

OFFICER'S RETURN

Came to hand on the _____ day of _____, 20____, at _____, o'clock ____m., and executed in _____, County, Texas by delivering to each of the within named defendants in person, a true copy of this Citation with the date of delivery endorsed thereon, together with the accompanying copy of the Citation at the following times and places, to-wit:

Name	Date/Time	Place, Course and Distance from Courthouse
_____	_____	_____

And not executed as to the defendant(s), _____

The diligence used in finding said defendant(s) being:

and the cause or failure to execute this process is:

and the information received as to the whereabouts of said defendant(s) being:

FEES:

Serving Petition and Copy \$ _____
 Total \$ _____

_____, Officer
 _____, County, Texas
 By: _____, Deputy

 Affiant

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.

In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign and return. The signature is not required to be verified. If the return is signed by a person other than a sheriff, constable or the clerk of the court, the return shall be signed under penalty of perjury and contain the following statement:

"My name is _____, my date of birth is _____, and my address is _____
 (First, Middle, Last)

(Street, City, Zip)

I DECLARE UNDER PENALTY OF PERJURY THAT THE FORGOING IS TRUE AND CORRECT.

Executed in _____, County, State of _____, on the _____ day of _____.

 Declarant/Authorized Process Server

 (Id # expiration of certification)

I CERTIFY THIS IS A TRUE COPY
 Witness my Hand and Seal of Office

October 27, 2020

JAMIE SMITH, DISTRICT CLERK
 JEFFERSON COUNTY, TEXAS

Jamie Smith Page 2 of 2





I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

October 27, 2020

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith

Certified Document Number: 2249942 Total Pages: 2

In accordance with Texas Government Code 51.301 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail districtclerk@co.jefferson.tx.us

EXHIBIT C-3

FILED

DISTRICT CLERK OF

JEFFERSON COUNTY, TEXAS

10/15/2020 9:38 AM

JAMIE SMITH

DISTRICT CLERK

A-206368

CITATION

THE STATE OF TEXAS

No. A-0206368

SARAH WILSON
VS. BIG LOTS STORES INC

CITATION

58th JUDICIAL DISTRICT COURT
of JEFFERSON COUNTY, TEXASTo: BIG LOTS STORES INC
BY SERVING ITS REGISTERED AGENT CORPORATION SERVICE COMPANY
DBA CSC-LAWYERS INCORPORATING SERVICE COMPANYby serving at:
211 E 7TH STREET
SUITE 620
AUSTIN, TX 78701

DEFENDANT:

NOTICE:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. Said answer may be filed by E-filing through efiletexas.gov, if represented by an attorney; or if filed pro se by delivering or mailing same to: District Clerk's Office, 1085 Pearl, Room 203, Beaumont, TX 77701. The case is presently pending before the 58th District Court of Jefferson County sitting in Beaumont, Texas, and was filed on the 24th day of September, 2020. It bears cause number A-0206368 and is styled:

SARAH WILSON
VS.
BIG LOTS STORES INC

Plaintiff:

Defendant:

The name and address of the attorney for plaintiff (or plaintiff if pro se) is:

JUHAN, JONATHAN, Atty.
985 J-10 NORTH SUITE 100
BEAUMONT, TX 77706.0Affidavit
Attached

The nature of the demands of said plaintiff is shown by a true and correct copy of Plaintiff's PETITION (PLAINTIFF'S ORIGINAL) accompanying this citation and made a part thereof.

Issued under my hand and the seal of said court, at Beaumont, Texas, this the 25th day of September, 2020.

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

BY

Erin Hauger

Deputy

Erin

I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

October 27, 2020

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith Page 1 of 2



AFFIDAVIT OF SERVICE

State of Texas

County of Jefferson

58th Judicial District Court

Case Number: A-0206368

Plaintiff:
Sarah Wilson

vs.

Defendant:
Big Lots Stores, Inc.

For:
Jonathan Juhan
985 I-10 North
Suite 100
Beaumont, TX 77706

Received by Zakon, LLC on the 30th day of September, 2020 at 3:15 pm to be served on Big Lots Stores, Inc., 211 E 7th Street, Suite 620, Austin, TX 78701.

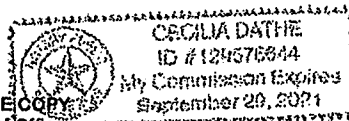
I, Chris Dathe, being duly sworn, depose and say that on the 1st day of October, 2020 at 2:05 pm, I:

served a CORPORATION by delivering a true copy of the Citation, Plaintiff's Original Petition, Request for Disclosure, and Rule 193.7 Notice with the date of service endorsed thereon by me, to: Samantha Guerra as Intake Agent for Corporation Service Company who is the Registered Agent for Big Lots Stores, Inc., at the address of: 211 E 7th Street, Suite 620, Austin, TX 78701, and informed said person of the contents therein, in compliance with state statutes.

I certify that I am over the age of 18, have no interest in the above action, and am a Certified Process Server, in good standing, in the judicial circuit in which the process was served.

Subscribed and Sworn to before me on the 2nd
day of October, 2020 by the affiant
who is personally known to me.

Chris Dathe
NOTARY PUBLIC



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

October 27, 2020

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith Page 2 of 2

Chris Dathe
PSC 6008, Exp. 12-31-20

Zakon, LLC
148 South Dowlen
#668
Beaumont, TX 77707
(409) 347-7413

Our Job Serial Number: MCI-2020001482





I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

October 27, 2020

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith

Certified Document Number: 2254962 Total Pages: 2

In accordance with Texas Government Code 51.301 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail districtclerk@co.jefferson.tx.us

EXHIBIT C-4

FILED
DISTRICT CLERK OF
JEFFERSON CO TEXAS
10/26/2020 10:23 AM
JAMIE SMITH
DISTRICT CLERK
A-206368

CAUSE NO. A-0206368

SARAH WILSON,

Plaintiff,

V.

BIG LOTS STORES, INC.,

Defendants.

§ IN THE DISTRICT COURT OF

§

§

§

§ JEFFERSON COUNTY, TEXAS

§

§

§

§ 58TH JUDICIAL DISTRICT

DEFENDANT BIG LOTS STORES, INC.
ORIGINAL ANSWER

COMES NOW, BIG LOTS STORES, INC., the Defendant herein, and files its Original Answer as follows:

I.
GENERAL DENIAL

Defendant denies each and every, all and singular, material allegations contained within Plaintiffs' pleadings and any amendments or supplements thereto and demands strict proof thereof in accordance with the Texas Rules of Civil Procedure.

II.
JURY DEMAND

In accordance with Rule 21 6 of the TEXAS RULES OF CIVIL PROCEDURE, Defendant demands a trial by jury.

III.
193.7 NOTICE

Pursuant to Rule 193.7 of the TEXAS RULES OF CIVIL PROCEDURE, Defendant hereby gives actual notes to Plaintiff that any and all documents produced by Plaintiff may be used against Plaintiff at any pretrial proceeding or at the trial of this matter without the necessity of authenticating the documents.



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

DEFENDANT BIG LOTS STORES, INC.'s ORIGINAL ANSWER-- PAGE 1

October 27, 2020
JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith Page 1 of 3

WHEREFORE, PREMISES CONSIDERED, BIG LOTS STORES, INC. prays that Plaintiff take nothing by this suit, that Plaintiff be required to pay Defendant's costs, and for such other and further relief, both general and special, at law and in equity, to which Defendant may show itself justly entitled.

Respectfully submitted,

MAYER LLP
750 N. St. Paul Street, Suite 700
Dallas, Texas 75201
214.379.6900 / Fax 214.379.6939

By: /s/ Zach T. Mayer
Zach T. Mayer
State Bar No. 24013118
zmayer@mayerllp.com
Sara Krumholz
State Bar No. 24060579
skrumholz@mayerllp.com

**ATTORNEYS FOR DEFENDANT
BIG LOTS STORES, INC.**



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

DEFENDANT BIG LOTS STORES, INC.'s ORIGINAL ANSWER- PAGE 2

October 27, 2020
27694 v1 (79539.00099)

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith
Page 2 of 3

CERTIFICATE OF SERVICE

This is to certify that on the 26th day of October 2020, a true and correct copy of the foregoing has been forwarded to all counsel of record as follows:

Via E-File

Jonathan C. Juran

SBN: 11047225

jonathanjuhan@sbcglobal.net

Regina C. Bost

SBN: 24095693

regina.juhanlaw@gmail.com

Attorneys for Plaintiff

985 I-10 North, Ste. 100

Beaumont, TX 77706

409/832-8877 - Telephone

409/924-8880 - Facsimile

Attorneys for Plaintiffs

/s/ Zach T. Mayer

Zach T. Mayer



I CERTIFY THIS IS A TRUE COPY

Witness my Hand and Seal of Office

DEFENDANT BIG LOTS STORES, INC.'s ORIGINAL ANSWER-- PAGE 3

October 27, 2020
27694 VI (79539.00099)

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith

Page 3 of 3



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

October 27, 2020

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith

Certified Document Number: 2257719 Total Pages: 3

In accordance with Texas Government Code 51.301 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail districtclerk@co.jefferson.tx.us

EXHIBIT C-5



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

October 27, 2020

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith

Certified Document Number: 2258088 Total Pages: 1

In accordance with Texas Government Code 51.301 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail districtclerk@co.jefferson.tx.us

EXHIBIT C-6

Job Name: CML106 DCLASH
 Page: 1

Date Run: 10/27/20
 Time Run: 9:39:09

*** CASE LEDGER ***

Case Number: A-0206368- Filed: 9/24/20 Case Type: PERSONAL INJURY Status: PENDING

Plaintiff: SARAH WILSON
 VS Defendant: BIG LOTS STORES INC

Plaintiff Attorney: JUHAN, JONATHAN
 Defendant Attorney: JUHAN, JONATHAN

Date	Cause No.	Name	Debit Description	Credit Amount/ Debit Amount	Receipt No/ Balance
9/24/20	A-0206368-	JUHAN, JONATHAN	INSTRUMENT		
			PETITION (PLAINTIFF'S ORIGINAL)		.00
			CIVIL PROCESS FORM		.00
					.00-
9/25/20	A-0206368-	JUHAN, JONATHAN	RECORDS MANAGEMENT	276.40+	B 0491671
			RECORDS ARCHIVE FEE	10.00-	
			COUNTY FILING FEE	10.00-	
			STATE FILING FEE	50.00-	
			LIBRARY FEE	50.00-	
			MEDIATION CENTER FEE	10.00-	
			STENO	15.00-	
			SECURITY FEE	15.00-	
			INDIGENT FEE	5.00-	
			JUDICIAL SUPPORT	10.00-	
			APPELLATE JUDICIAL SYSTEM	42.00-	
			ELECTRONIC FILING FEE	5.00-	
			COURT RECORD PRESERVATION	30.00-	
			SECURITY OF COURTS AND JUDGES	10.00-	
			DISTRICT CLERK SERVICE CHARGE	5.00-	
			MAILING SERVICE	8.00-	
				1.40-	
					.00+
10/15/20	A-0206368-	JUHAN, JONATHAN	CITATION		
			CITATION (RETURN)		
			OUTSIDE SERVICE	.00 OC	
				.00	
					.00+
10/26/20	A-0206368-	JUHAN, JONATHAN	ANSWER		
				.00	
					.00+

I CERTIFY THIS IS A TRUE COPY
 Witness my Hand and Seal of Office

October 27, 2020

JAMIE SMITH, DISTRICT CLERK
 JEFFERSON COUNTY, TEXAS

Jamie Smith





I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

October 27, 2020

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith

Certified Document Number: 2258089 Total Pages: 1

In accordance with Texas Government Code 51.301 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail districtclerk@co.jefferson.tx.us